

Exhibit 21

[REDACTED] v. ARPAIO & THE CITADEL

2-21-2005

John S. Grinalds

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State of South Carolina)
) In the Court of Common Pleas
County of Charleston)

) C/A No: [REDACTED]
[REDACTED]
)
Plaintiff,)
) Deposition
vs.)
) of
Michael Arpaio and The)
Citadel,) John S. Grinalds
)
Defendants.)

Deposition of Major
General John S. Grinalds, taken before Sandra A. Reed, a
notary public in and for the State of South Carolina,
commencing at the hour of 11:08 a.m., Monday, February
21, 2005, at The Citadel, Bond Hall, 171 Moultrie
Street, Charleston, South Carolina.

Copy

Reported by

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1 required to have their head shaved or their hair
2 cut when they come in? Is --

3 A No.

4 Q That's not a requirement?

5 A No.

6 Q I know you told me that there's a quasi-military
7 component to the camp, but is it -- is it supposed
8 to be set up like The Citadel in terms of the
9 system? three-part --

10 A Like -- if referring to the fourth-class system,
11 no.

12 Q Okay. What is your understanding of the senior
13 counselor? Let me ask it again in a different way:
14 My understanding is that the senior counselor is
15 sort of right under the director and assistant
16 director in terms of being in control of the camp;
17 is that your understanding?

18 A That's correct, uh-huh.

19 Q Do you know what the average age of the senior
20 counselor normally is?

21 A Usually be a graduate, a recent graduate. It would
22 depend, I think, to a certain extent upon the
23 maturity and the capabilities of the person
24 involved.

25 Q But normally a recent graduate, a college graduate,